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22 *Attorneys for Plaintiffs*

23 **UNITED STATES DISTRICT COURT**

24 **FOR THE DISTRICT OF NEVADA**

25 MARIA TSATAS, an individual; LEONIDAS  
26 VALKANAS, as trustee of the KEET TRUST  
27 dated August 1, 2015; RAYMOND BARAZ,  
28 an individual; PASCAL ABDALLAH, an  
individual; JIMMY TSOUTSOURAS, an  
individual; FOTINI VENETIS, an individual;  
NICHOLAS TSOUTSOURAS, an individual;  
CONNIE TSOUTSOURAS, an individual;  
RAYMONDE KANHA, an individual;  
ALFRED BEKHIT, an individual; JACQUEZ  
ELBAZ, an individual; MARTINE  
BENEZRA, an individual; JAMES P.  
CARROLL, an individual; DAVID CHIN, an  
individual; JENNIFER MILLS, an individual;  
PAUL SUBLETT, an individual; ANDREW  
SUBLETT, an individual; MANOLIS  
KOSTAKIS, an individual; ESTHER  
GEORGAKOPOULOS, an individual;  
EVAGELIA KOSTAKIS, an individual;  
DENIS PARSONS, an individual; SOFIA  
KARDARAS, an individual; JIMMY  
ASMAKLIS, an individual; CORRADINO

29 CASE NO.: 2:20-cv-2045-RFB-BNW

30 **STIPULATION TO EXTEND TIME TO  
31 FILE RESPONSES AND REPLY BRIEFS  
32 TO DEFENDANTS' MOTION FOR CASE  
33 DISPOSITIVE SANCTIONS (ECF NO. 242)  
34 BY 7 DAYS**

35 **(Second Request)**

1 GALUPPO, an individual; DENIS KOPITAS,  
2 an individual; TERRY TSATAS, an  
3 individual; GEORGE TSATAS, an individual;  
4 PANAGIOTA TSATAS, an individual;  
5 OURANIA TSATAS, an individual;  
6 KIRIAKOS PRIMBAS, an individual;  
7 EVANTHIA PRIMBAS, an individual;  
8 PATRICK AYOUB, an individual; MICHAEL  
9 BESCEC, an individual; ERNEST LEBOEUF,  
an individual; PHILIPPE LEGAULT, an  
individual; EFTIHIOS LITSAKIS, an  
individual; GIOVANNI MONCADA, an  
individual; MARC RIEL, an individual;  
JARADEH SALIM, an individual; HANI  
HAMAM, an individual; CONSTANTIN  
ZISSIS, an individual; BESSIE PEPPAS, an  
individual; NIKI PALIOVRAKAS, an  
individual,

10 Plaintiffs,

11 v.

12 AIRBORNE WIRELESS NETWORK, INC., a  
13 Nevada Corporation; MICHAEL J. WARREN,  
14 an individual; J. EDWARD DANIELS, an  
individual; MARIUS DE MOS, an individual;  
15 JASON DE MOS, an individual; ROBERT  
BRUCE HARRIS, an individual; KELLY  
KABILAFKAS, an individual; and  
APCENTIVE, INC., a Nevada Corporation,

16 Defendants.

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1                   **STIPULATED REQUEST FOR SECOND EXTENSION OF DEADLINE TO FILE**  
 2                   **RESPONSE AND REPLY BRIEFS TO ECF NO. 242**

3                   Plaintiffs (as listed in the above caption, with the exception of the ten named plaintiffs for  
 4                   whom the Court granted a Motion to Withdraw (ECF No. 219) and for which there is a pending  
 5                   unopposed request to dismiss them (ECF No. 236)) and Defendants (as listed in the above caption,  
 6                   with the exception of the deceased defendant Marius de Mos) (together, the “Parties”), by and  
 7                   through their undersigned counsel of record, submit this Stipulation to Extend Time to File  
 8                   Responses and Replies pursuant to LR IA 6-1, LR IA 6-2, and LR 7-1.

9                   WHEREAS, on March 7, 2024, Defendants filed a Motion for Case Dispositive Sanctions  
 10                  for Perjury and Other Misconduct Against All Plaintiffs, or in the Alternative Against Plaintiff  
 11                  Leonidas Valkanas, as Trustee of the Keet Trust (ECF No. 242).

12                  WHEREAS, the Parties met and conferred about material that was filed in the Declaration  
 13                  of Peter L. Chasey, Esq. (ECF No. 242-1) that Plaintiffs designated as “CONFIDENTIAL”  
 14                  pursuant to the August 9, 2021 Stipulated Protective Order and Confidentiality Agreement (ECF  
 15                  No. 64).

16                  WHEREAS, on March 14, 2024, the Parties reached a stipulation to strike (ECF No. 245)  
 17                  the Declaration of Peter L. Chasey, Esq. (ECF No. 242-1) and replace it with the Amended  
 18                  Declaration of Peter L. Chasey, Esq. (ECF No. 243-1), filed on March 13, 2024 and which redacted  
 19                  the information Plaintiffs designated as “CONFIDENTIAL.”

20                  WHEREAS, the meet and confer process regarding the “CONFIDENTIAL” material took  
 21                  time away from Plaintiffs’ ability to oppose Defendants’ Motion (ECF No. 242) on the merits.

22                  WHEREAS, the Parties reached a stipulation to extend Plaintiffs’ response date to  
 23                  Defendants’ Motion by one week (ECF No. 246), which the Court granted on March 18, 2024  
 24                  (ECF No. 248).

25                  WHEREAS, the Parties agreed that Plaintiffs could have an additional week to respond to  
 26                  Defendants’ Motion, without prejudice to requesting an additional week, if needed. ECF No. 246  
 27                  at p. 3. Plaintiffs’ counsel disclosed to Defendants’ counsel that he had a case set for trial on April  
 28                  3, 2024, and Defendants’ counsel had no objection, as a professional courtesy, to an additional

1 extension, if needed.

2 WHEREAS, Plaintiffs' counsel needs an additional week to respond to Defendants'  
 3 Motion because of significant pre-trial responsibilities in another matter set for trial on April 3,  
 4 2024 (including the preparation of pre-trial filings due on March 22, 2024 and opposing two ex  
 5 parte applications on March 20, 2024, which were heard on March 21, 2024).

6 WHEREAS, this is the Parties' second request for an extension of the deadlines to file a  
 7 Response and Reply Brief to Defendants' Motion (ECF No. 242).

8 THEREFORE, IT IS HEREBY STIPULATED AND AGREED between the Parties, by  
 9 and through their respective attorneys of record, that, for good cause, the deadlines to file a  
 10 Response and Reply Brief to Defendants' Motion (ECF No. 242) is extended by one week as  
 11 follows (with one additional day for the reply brief as an agreed-upon professional courtesy):

12	Current deadline to file Response to	March 28, 2024
13	Defendants' Motion for Case Dispositive	
14	Sanctions (ECF No. 242)	
15	<b>New deadline to file Response to</b>	<b>April 4, 2024</b>
16	<b>Defendants' Motion for Case Dispositive</b>	
17	<b>Sanctions (ECF No. 242)</b>	
18	Current deadline to file Replies re Defendants'	April 4, 2024
19	Motion for Case Dispositive Sanctions (ECF	
20	No. 242)	
21	<b>New deadline to file Replies re Defendants'</b>	<b>April 12, 2024</b>
22	<b>Motion for Case Dispositive Sanctions (ECF</b>	
23	<b>No. 242)</b>	

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 25 **IT IS SO STIPULATED.**

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 27 DATED: March 25, 2024

1 Respectfully submitted.  
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5 VC2 LAW  
6 NOVIAN & NOVIAN, LLP  
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8 By: /s/ Andrew B. Goodman  
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10 MICHAEL C. VAN, ESQ. #3876  
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19 *Attorneys for Plaintiffs*

20 DATED: March 25, 2024

21 Respectfully submitted.  
22

23 CHASEY LAW OFFICES  
24 LAW OFFICES OF S. DON BENNION  
25

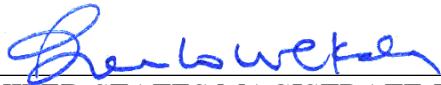
26 By: /s/ Peter Chasey  
27

28 PETER L. CHASEY, ESQ. #7650  
3295 N. Fort Apache Road, Suite 110  
Las Vegas, Nevada 89129

33 S. Don Bennion, Esq. #4530  
34 6980 O'Bannon Drive, Suite 400  
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36 *Attorneys for Defendants*

37 IT IS SO ORDERED:  
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40 UNITED STATES MAGISTRATE JUDGE  
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42 DATED: 3/26/2024  
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**CERTIFICATE OF SERVICE**

I, Amanda McGill, declare that I am employed by the law firm of Novian & Novian, LLP, a citizen of the United States of America, a resident of the state of California, over the age of eighteen (18) years, not a party to the above-entitled action, and competent to be a witness herein.

On March 25, 2024, I caused a true and correct copy of the foregoing document to be served on the person(s) listed below in the manner indicated:

1	Peter L. Chasey, Esq. Chasey Law Offices 3295 N. Fort Apache Road, Suite 110 Las Vegas, Nevada 89129 Email: <a href="mailto:peter@chaseylaw.com">peter@chaseylaw.com</a>	<input type="checkbox"/> Via Hand Delivery <input checked="" type="checkbox"/> Via First Class Mail <input type="checkbox"/> Via Facsimile <input checked="" type="checkbox"/> Via Electronic Mail <input checked="" type="checkbox"/> Via CM/ECF
4	S. Don Bennion, Esq. Law Offices of S. Don Bennion 6980 O'Bannon Drive, Suite 400 Las Vegas, NV 89117 Email: <a href="mailto:don@bennionlaw.com">don@bennionlaw.com</a>	
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9	Jimmy Asmakkis Email: <a href="mailto:jda86@outlook.com">jda86@outlook.com</a>	
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20	Jaradeh Salim 11515 Rue LaForest Montreal, Quebec, Canada H3M2W5	
22	Hani Hamam 7550 Querbes Ave. Montreal, Quebec, Canada H3N 2B6	
24	Marius de Mos Email: <a href="mailto:wind-power@msn.com">wind-power@msn.com</a>	

26  
27 DATED March 25, 2024.

28 /s/ Amanda McGill

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